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19 **UNITED STATES DISTRICT COURT**  
20 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24 TERREN SCOTT PEIZER

25 Defendant.

Case No. 2:23-cr-00089(A)-DSF

**DECLARATION OF DAVID K.  
WILLINGHAM IN SUPPORT OF  
DEFENDANT TERREN PEIZER'S  
APPLICATION FOR LEAVE TO  
FILE UNDER SEAL PORTIONS OF  
SENTENCING RESPONSE**

Date: February 24, 2025

Time: 8:30 a.m.

Crtrm.: 7D

The Honorable Dale S. Fischer

**DECLARATION OF DAVID K. WILLINGHAM**

1. I am an attorney at the law firm of King & Spalding LLP and represent Defendant Terren Scott Peizer in this matter. I make this declaration based on personal knowledge.

2. Defendant Peizer seeks to seal limited portions of the Sentencing Response, as identified in blue highlighting in the attached true and correct unredacted copy of Peizer's Sentencing Response that is being filed under seal. The portions of the document to be sealed reference Defendant's sensitive and private health and medical information.

3. A true and correct redacted copy of Defendant Peizer's Sentencing Response is being filed in the public record.

4. There is good cause to protect the aforementioned material from being disclosed to the public, as detailed in Defendant's accompanying Application for Leave to File Under Seal Portions of Defendant's Sentencing Response.

5. On January 23, 2025, the government indicated that it does not object to the sealing of the requested materials.

I declare under the penalty of perjury and the laws of the United States that the foregoing is true and correct this 29th day of January 2025, at Los Angeles, California.

/s/David K. Willingham

David K. Willingham